IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

AMERICAN CIVIL LIBERTIES UNION, et al.,	))))	
Plaintiffs,	)))	
v.	)))	Civil Action No. 98-CV-5591
ERIC H. HOLDER, in his official capacity as ATTORNEY GENERAL OF THE UNITED STATES,	)))))	
Defendant.	))	

JOINT MOTION TO EXTEND TIME

Plaintiffs American Civil Liberties Union *et al.* and Defendant Eric H. Holder hereby jointly move this Court for additional time in which to file Plaintiffs' renewed motion for costs, fees, and expenses pursuant to 28 U.S.C. § 2412.

The instant motion arises out of the dispute between the parties regarding Plaintiffs' claims for costs, fees and expenses pursuant to 28 U.S.C. § 2412.
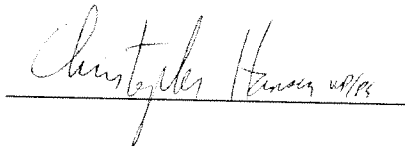
On February 20, 2009, in the interests of reaching a negotiated settlement with Defendant on this issue, Plaintiffs filed a placeholder Motion for Costs, Fees and Expenses with this Court. (Doc. No. 441.) On April 30, 2009, this Court entered an Order denying that first Motion without prejudice, and setting a briefing schedule for a renewed motion. (Doc. No. 442.) Pursuant to that Order, Plaintiffs' renewed motion papers are due by July 1, 2009.

Since that time, the parties have continued to negotiate and are making significant progress in settlement talks. To allow time for the settlement process to continue, the parties jointly request that this Court extend the schedule set out in this Court's April 30, 2009 Order by two months, such that:

1) Plaintiffs' renewed motion for costs, fees and expenses shall be filed by September 1, 2009;

2) Defendant's response in opposition shall be filed by November 2, 2009; and

3) Plaintiffs' reply shall be filed by December 1, 2009.
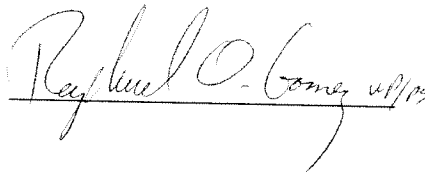
Dated: June 25, 2009

AMERICAN CIVIL LIBERTIES UNION

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